

**UNITED STATES OF AMERICA
DISTRICT COURT OF RHODE ISLAND**

United States of America

V.

Case no: 14-cr-00016-WES

Philip DeBartolo

**DEFENDANT’S MOTION FOR COMPASSIONATE RELEASE DUE TO THE
COVID-19 PANDEMIC**

Now comes the defendant in the above captioned matter with a motion to release him from custody due to “extraordinary and compelling reasons” in accordance with with 18 U.S.C. 3582 (c)(1)(A)(i). As grounds for this motion, the defendant states that he has chronic medical problems which make him more susceptible to the harmful effects of the novel coronavirus and the associated COVID-19 disease as described and argued more fully in the attached memorandum of law.

WHEREFORE, the defendant requests the Court modify his sentence to time served and release him to supervised release or home confinement.

Respectfully submitted,
Philip DeBartolo
By his attorney,

/s/ Jason Knight

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Date: May 29, 2020

CERTIFICATION

I certify that on May 29, 2020, I served the above document on AUSA Milind Shaw via the Court's Case Management/Electronic Case Files (CM/ECF) system.

/s/ Jason Knight